

**EXHIBIT A**  
**DEPOSITION EXCERPTS OF**  
**BRANDON ISAACS, MD.**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

DEMETRIOS VORGAS,  
Plaintiff,

vs.

COMMUNITY HEALTH OF CENTRAL  
WASHINGTON,

Defendant.

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)  
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)  
) NO.  
) 1:21-CV-03013-  
) SAB  
)  
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)

VIDEOTAPED DEPOSITION

UPON ORAL EXAMINATION OF

DR. BRANDON ISSACS

TAKEN ON: Monday, October 18, 2021

TAKEN VIA REMOTE AUDIO/VISUAL TELECONFERENCE

REPORTED BY: NOREEN MATTIMOE, RPR, CCR  
CCR NO. 1926

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25

## I N D E X

IN RE: Vorgias vs Community Health of Central  
Washington  
NO. 1:21-CV-03013-SAB  
October 18, 2021

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1       been arrested and they were charging -- it was a CPS  
2       case.

3       Q. Okay. Perfect. That helps.

4               And just so -- kind of just so you know a  
5       little bit of background, this is a discovery  
6       deposition so there's a wide range of topics we may  
7       cover just trying to get information.

8       A. Got it.

9       Q. Okay. What's your current position related to your  
10      job?

11      A. I am the current Program Director/DIO for Central  
12      Washington Family Medicine Residency in Yakima.

13      Q. Okay. And tell me, in terms of what's the relationship  
14      for Central Washington Family Medicine as it relates to  
15      Community Health of Central Washington.

16      A. Community Health of Central Washington is the  
17      sponsoring institution for Central Washington Family  
18      Medicine Residency, so all personnel management,  
19      financial responsibility, all gets funneled through  
20      that as the primary entity that sponsors our residency.

21      Q. All right. That's helpful. So to confirm: The  
22      personnel management includes management of the  
23      residents?

24      A. Correct.

25      Q. All right. The --

1 A. Yes, and it is purposefully void -- or vague, I should  
2 say, in an attempt to maintain patient confidentiality  
3 appropriately.

4 So their determination is, exactly as you said  
5 right there, is to determine if you are fit to practice  
6 as a resident. That is the main thing we need to know;  
7 that there is nothing that is problematic in their  
8 ability to be a practitioner.

9 Q. Part of the purpose, though, as I understand it, is  
10 you're trying to figure out if there's something you,  
11 as the program director and/or program, can do to  
12 assist a struggling resident in the program; true?

13 A. Depending on the recommendation from WAPHP, yes.

14 Q. And if you receive a good -- a good -- strike that.

15 If you receive a recommendation from Washington  
16 Physician's Health Program, do you typically follow the  
17 recommendation or do you just ignore it?

18 A. We follow it --

19 MR. BAILEY: Objection. Hypothetical.

20 Q. Go ahead, doctor.

21 A. Yeah. We follow it, otherwise we wouldn't ask for it,  
22 in the first place.

23 Q. Okay. And then I want to move down a little bit on  
24 No. 10. It's highlighted here where it says, (as  
25 read:) "You will seek, with the stress of residency --

STATE OF WASHINGTON )  
 ) ss.  
COUNTY OF CHELAN )

Noreen Mattimoe-Nystrom, RPR, CCR  
CCR NO, 1926